



FINDING OF NO SIGNIFICANT IMPACT RE-AFFIRMATION

Memphis (Shelby County), Tennessee

Loan No. SRF 2021-451

December 2, 2020

All projects funded through the State of Tennessee's State Revolving Fund (SRF) Loan Program undergo a review to determine whether the proposed project will have a significant impact on the environment. In making this determination, it is assumed that all facilities and actions recommended in the facilities plan will be implemented.

A Finding of No Significant Impact (FNSI) was issued on February 19, 2013, and included lagoon improvements at the T. E. Maxson Wastewater Treatment Plant (WWTP); outfall modifications at the M. C. Stiles WWTP; Phase 2 of the Mary's Creek Interceptor Sewer project; and a City-Wide Sewer Assessment and Rehabilitation project for the City of Memphis' sewer collection system. The regulations (40 CFR Part 6.508) for implementing the National Environmental Policy Act require that construction projects covered by FNSIs over five years old must be re-examined to determine if the environmental impacts have changed.

The City of Memphis is continuing its City-Wide Sewer Assessment and Rehabilitation project, which consists of annually evaluating and rehabilitating approximately 240 miles of existing gravity sewer lines, manholes, force mains and pumping stations by methods of point repairs, pipe lining, pipe bursting, sectional replacements, and manhole rehabilitation and replacement. The City's sewer collection system consists of approximately 100 pumping stations and 3,300 miles of sewer lines. Capital expenditures for the evaluation and rehabilitation of the sewer system were estimated to be \$350 million in 2013 and proposed to take approximately ten years to complete.

The City of Memphis has requested a SRF loan for \$15,000,000 to construct the Group 2 Cured-In-Place Pipe (CIPP) and Group 2 Relay projects. The Group 2 CIPP project consists of rehabilitating approximately 35,000 linear feet (LF) of existing 8-inch through 24-inch diameter gravity sewer lines and manhole rehabilitation. The Group 2 Relay project consists of rehabilitating approximately 20,000 LF of existing 8-inch through 12-inch diameter gravity sewer lines and manhole rehabilitation. The City of Memphis plans to apply for additional SRF loans and use local funds to complete the City-Wide Sewer Assessment and Rehabilitation project. A map showing the area of the Group 2 CIPP and Group 2 Relay projects accompanies this FNSI Re-affirmation.

The SRF Loan Program has reviewed the proposed projects and re-affirms that the FNSI issued on February 19, 2013, is still accurate. The documentation to support this decision is on file with the SRF Loan Program and available for public review upon request. However, this re-affirmation can be revoked if significant adverse information becomes available. If you have any comments or wish to challenge this re-affirmation, please send your written comment(s) within 30 days of this re-affirmation to:

Ms. Felicia D. Freeman, Environmental Manager
State Revolving Fund Loan Program
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or call or email (615) 253-5134 or felicia.d.freeman@tn.gov.